in HONNOLD, WORKMEN'S COMPENSATION, p. 493). The courts appear to be in a state of change in regard to these workmen's compensation cases. The modern tendency seems to favor making the master an absolute insurer against all risks incidental to the course of employment. *Hiers* v. *Hull & Co.*, 178 App. Div. 350; *Horrigan* v. *Post Standard Co.*, 224 N. Y. 620; *Dove* v. *Alpena Hide and Leather Co.*, 198 Mich. 132, where servant in tannery, handling hides, died from septic infection, resulting from deceased's inhaling dust from the hides; *Blaess* v. *Dolph*, 195 Mich. 137, where undertaker's assistant died from a virulent type of streptococcus infection, which he contracted, in the course of handling a dead body, through a slight unexplained cut on his ring finger. It appeared in evidence in this last case that the only probable source of deceased's infection was through contact with the dead body of a person who had such an infection. So, too, in the case at hand it is a matter of common knowledge that "anthrax is primarily a disease of animals, such as sheep" (*McCauley* v. *Imperial Woolen Co., et al.*, 261 Pa. St. 312) and that it is almost universally contracted from handling infected hides or wool, and therefore it seems the court was justified in holding deceased's death was caused by accidental injury "arising out of and in course of his employment." At first sight it might appear that the case of *Chandler* v. *Great Western Ry. Co.*, [1912] 106 L. T. 479, is in conflict with these decisions, but there is really an essential point of distinction between them. There a railway fireman, while at home, cut his finger, sucked the wound, bound it up and went to work. While working, coal dust, oil, grease and other matters worked through the bandage into the cut, and septic infection resulted which necessitated amputation of his finger. The court held he could not recover, because to attribute this infection to his employment was at best a mere "surmise, conjecture, or guess," there being many possible sources of such infection. He might have gotten it from the cut alone, from sucking the cut, from dust in the road, or from various other imaginable sources which might give rise to such an infection. This case is distinguishable from the general line of cases, here set out, in that this fireman's septic infection, unlike anthrax or streptococcus infection, was attributable to no one specific probable source, as was true in the case of the wool-sorter and of the undertaker, and therefore the court did not have sufficient grounds of probability on which to base a decision that it was an accidental injury "arising out of and in course of his employment." See other articles as to accidents "arising out of and in course of employment" in 12 MICH. L. REV. 614, 688; 14 MICH. L. REV. 525; 15 MICH. L. REV. 92, 606; 16 MICH. L. REV. 179, 462; 18 MICH. L. REV. 72; 25 YALE L. JOUR. 333; 26 YALE L. JOUR. 76.

NAVIGABLE WATERS—RIPARIAN RIGHTS—ACCRETION.—From 1885 to 1895 the bottom of the river in front of the plaintiff's property was used as a dumping ground under the direction of government officials. The effect of such deposits was to accelerate deposit of alluvion, whereby fifty-four acres of new land were formed on the plaintiff's riparian front. Plaintiff contracted to convey this land to the defendant who refused to perform on the ground that he would be getting a doubtful title. Plaintiff sued for the purchase price.

The court treated the action as if it were a bill for specific performance, and *held,* that since the formation of the new land was not due solely to *natural* processes, the plaintiff's title was doubtful; hence, the court would not compel defendant to acept it.—*Black* v. *American International Corporation,* (Pa. 1919) 107 Atl. 737.

That land formed by the gradual and imperceptible deposit of alluvion in a stream belongs to the owner of the adjacent land to which it is attached was settled long ago.—*Gifford* v. *Yarborough,* (1828) 5 Bing. 163; *Warren* v. *Chambers,* 25 Ark. 120. The cases are agreed that the riparian owner acquires no new land which was not formed gradually and imperceptibly, but there has been some discussion as to whether or not the deposit of alluvion must have been caused solely by natural processes; i. e., as to the effect of the presence of artificial conditions aiding the accretions. In *Halsey* v. *McCormick,* 18 N. Y. 147, the court said *obiter,* "I find no such distinction in the books. If by some artificial structure or impediment in the stream, the current should be made to impinge more strongly against one bank, causing it imperceptibly to wear away, and causing a corresponding accretion on the opposite bank, I am not prepared to say that the riparian owned would not be entitled to the alluvion thus formed, especially as against the party who caused it." It was held in *Tatum* v. *St. Louis,* 125 Mo. 647, that the "riparian owner is entitled to the land formed by gradual and imperceptible accretions from the water, regardless of the cause which produced it. This right he cannot be deprived of by the acts of others over whom he has no control and for which he is in no way responsible." And Mr. Justice Swayne in *St. Clair County* v. *Lovingston,* 23 Wall. 66, referring to accretions caused by artificial obstructions, said, "The proximate cause was the deposits made by the water. * * * Whether the flow of the water was natural or affected by artificial means is immaterial." To the same effect is *Adams* v. *Frothingham,* 3 Mass. 352. And the Supreme Court of Tennessee decided that a riparian owner is the owner of accretions to his banks, even though those accretions are caused, or greatly accelerated, by the action of the city and the public in making such banks its dumping grounds. *Memphis* v. *Waite,* 102 Tenn. 274. It should be noted that all of the above cases were ones in which the artificial obstructions or deposits were made by persons other than the riparian owner who was claiming the newly formed land. It is clear that the riparian owner will not be permitted to increase his estate by creating an artificial condition for the purpose of effecting such increase. *Halsey* v. *McCormick, supra; Attorney General* v. *Chambers,* 4 D. G. & J. 55, 69; and see *Lovingston* v. *St. Clair County,* 64 Ill. 56. It is also evident that the major portion of the new land must be formed by the deposit of alluvion, and must not consist of the artificial matter deposited by human agencies. Just what proportion of the new land must consist of alluvion is, of course, incapable of determination by any rule of thumb, and for this reason the court in the principal case was justified in refusing the plaintiff relief. See *Sebring* v. *Mersereau,* 9 Cow. (N. Y.) 344.

PAUPERS—"POOR PERSONS"—CONTRIBUTION FOR SUPPORT.—In a proceeding to make defendants, parents of an alleged pauper, contribute money for his